

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20540-CR-ALTONAGA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DELVIS LARA FUENTES, et. al.,

Defendant.

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**UNOPPOSED MOTION TO CONTINUE TRIAL**

Comes now the Defendant, Delvis Lara Fuentes, joined by the co-defendants in this case, by and through undersigned counsel and files this Unopposed Motion to Continue Trial and in support thereof states:

1. This case is scheduled for a Calendar Call February 21, 2023. A Jury Trial is scheduled in this case for, February 27, 2023.
2. The government has provided the defense with three productions of discovery.
3. It has advised that there is another discovery production that contains approximately 350 gigabytes of evidence.
4. Counsel provided an external hard drive to the government in order to receive this latest discovery.
5. All counsel need additional time to review this latest discovery production with their respective clients and also need additional time to prepare for trial.

6. Counsel spoke with Assistant United States Attorney, Maria Catala, regarding the content of this motion and discussed a proposed trial date. Ms. Catala stated that she did not oppose this motion.
7. Additionally, counsel also spoke to Mr. Alfredo Izaguirre and Mr. Jean-Michel D'Escoubet, counsels for the other two co-defendants in this case. Both counsels stated that they join this Motion to Continue the Trial.
8. The defense moves for a 60 day continuance of the trial date and would ask for a calendar call and a trial date in late April.

WHEREFORE, undersigned counsel prays this Honorable Court enter its Order granting this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was on this 10th day of February 2023, furnished to all interested parties via the CF/ECF filing system.

Omar A. Lopez, Esquire  
Omar A. Lopez, Esquire